

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DOLORES LOZANO;

Plaintiff,

v.

BAYLOR UNIVERSITY,
ART BRILES, *in his individual capacity*,
and
IAN McCRAW, *in his individual capacity*,

Defendants.

Case No.: 6:16-cv-00403

Hon. Robert Pitman

PLAINTIFF DOLORES LOZANO'S NOTICE TO THE COURT

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff Dolores Lozano files these documents as directed by Pre-trial Order Dkt. 246
and in accordance with Local Rule CV-16 and Rule 16 of the Federal Rules of Civil Procedure.

The documents contained within encompass as follows:

Exhibit 1. A list disclosing any objections to the use under Rule 32 of deposition testimony
designated by the other party.

1-A Plaintiff Dolores Lozano's Objections to Defendant Baylor University's
Deposition Designations for Trial

1-B Plaintiff Dolores Lozano's Objections to Defendant Ian McCaw Designation of
Deposition Testimony

1-C Plaintiff Dolores Lozano's Objections to Defendant Art Briles Deposition
Designations.

Exhibit 2. A list disclosing any objection, together with the grounds therefore, that may be

made to the admissibility of any exhibits. Objections not so disclosed, other than objections under Federal Rules of Evidence 402 and 403 shall be deemed waived unless excused by the court for good cause shown.

- 2-A Plaintiff Dolores Lozano's Objections to Defendant Baylor University's Trial Exhibits.
 - 2-B Plaintiff Dolores Lozano's Objections to Defendant Ian McCaw's Exhibit List
 - 2-C Plaintiff Dolores Lozano's Objections to Defendant Art Briles' List of Trial Exhibits
- Exhibit 3. Responses to any motion in limine.
- 3.A Plaintiff Dolores Lozano's Response to Defendant Baylor University's Motion in Limine
 - 3-B Plaintiff Dolores Lozano's Response to Defendant Ian McCaw's Motion in Limine
 - 3-C Plaintiff Dolores Lozano's Response to Defendant Ian McCaw's Motion in Limine

Dated: September 22, 2023

Respectfully submitted,

/s/ Sheila P. Haddock

Sheila P. Haddock

Attorney-in-charge

Texas State Bar No. 00790810

Sheila@zalkin.com

Irwin M. Zalkin (*pro hac vice*)

irwin@zalkin.com

THE ZALKIN LAW FIRM, P.C.

10590 W Ocean Air Drive, Ste. 125

San Diego CA 92130

Telephone: (858) 259-3011

Facsimile: (858) 259-3015

Zeke O. Fortenberry (Pro Hac Vice)

Texas State Bar No. 24061361

zeke@fortenberryfirm.com

Fortenberry Firm PLLC

18333 Preston Rd, Suite 375
Dallas, TX 75252
Telephone: (469)626-7373
Facsimile: (469)716-4190

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2023, I electronically filed the foregoing document with the Clerk of the Court through the ECF system and an email notice of the electronic filing was sent to all attorneys of record.

THE ZALKIN LAW FIRM, P.C.

/s/ Sheila P. Haddock
Sheila P. Haddock